

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL.,	§	BANKRUPTCY No. 21-51523
	§	
DEBTORS.	§	JOINTLY ADMINISTERED

**TRUSTEE’S WITNESS AND EXHIBIT LIST FOR NOVEMBER 1, 2022 HEARINGS ON:
TRUSTEE’S MOTION TO APPROVE (A) SALE OF PINBALL PROPERTY, (B) SALE PROCEDURES,
STALKING HORSE AGREEMENT AND BID PROTECTIONS IN CONNECTION WITH THE SALE OF
PINBALL PROPERTY FREE AND CLEAR OF LIENS AND INTERESTS PURSUANT TO 11 USC
§363(B) AND (F), AND (C) THE FORM OF NOTICE FOR THE SALE OF PINBALL PROPERTY
AND
TRUSTEE’S RULE 9019 MOTION TO APPROVE
COMPROMISE AND SETTLEMENT WITH DRAPER 5, LLC
[RELATING TO ECF NOS. 181 AND 182]**

John Patrick Lowe, Chapter 7 Trustee (“Trustee”), files this Witness and Exhibit List for the November 1, 2022 Hearings scheduled relating to the matters listed below.

MATTERS TO BE HEARD:

1. *Trustee’s Motion to Approve (A) Sale of Pinball Property, (B) Sale Procedures, Stalking Horse Agreement and Bid Protections in Connection with the Sale of Pinball Property Free and Clear of Liens and Interests Pursuant to 11 U.S.C. §363(b) and (f), and (C) the Form of Notice for the Sale of Pinball Property; and (2) Trustee’s Rule 9019 Motion to Approve Compromise and Settlement with Draper 5, LLC, seeking an expedited hearing on the Trustee’s Motion to Approve (A) Sale of Pinball Property, (B) Sale Procedures, Stalking Horse Agreement and Bid Protections in Connection with the Sale of Pinball Property Free and Clear of Liens and Interests Pursuant to 11 U.S.C. §363(b) and (f), and (C) the Form of Notice for the Sale of Pinball Property [ECF No. 181] (the “Sale and Procedure Motion”); and*
2. *Trustee’s Rule 9019 Motion to Approve Compromise and Settlement with Draper 5, LLC [ECF No. 182] (the “9019 Motion”)*

TRUSTEE’S WITNESSES:

Trustee designates the following witnesses:

1. J. Patrick “Pat” Lowe, Chapter 7 Trustee of the jointly administered bankruptcy estates
2. Any witness called or designated by any other party;
3. Any rebuttal or impeachment witnesses, as necessary; and
4. Any person present at the Hearing (live or via WebEx)

Trustee reserves the right to amend or supplement this list at any time prior to the hearing.

TRUSTEE'S EXHIBITS

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	Purchase and Sale Agreement by and between Trustee and Turner Logic, LLC (EXH B to ECF No. 181)				
2	Form of proposed Sale Procedures (EXH E to ECF No. 181)				
3	Form of proposed Notice of Sale (EXH F to ECF No. 181)				
4	Property Description [EXH A to both ECF Nos. 181 and 182]				
5	List of Office Furniture [EXH C to ECF No. 182]				
6	Settlement Agreement by and between Trustee and Draper 5, LLC [EXH F to ECF No. 181 and EXH E to ECF No. 182]				
7	Lease Agreement by and between Debtor Wizard Mode Media, Inc. and Draper 5, LLC [EXH B to ECF 182]				
8	Ledger of Draper 5, LLC [EXH D to ECF 182]				
	Any exhibits designated by any other party				
	Any rebuttal or impeachment exhibits				

Trustee reserve the right to amend or supplement this list at any time prior to the hearing.

Respectfully submitted,

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ATTORNEYS FOR CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of October, 2022, I electronically filed the foregoing document using the CM/ECF system, which will serve the document to the following parties requesting notice (a copy of the exhibits will be served via email)

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deeproot Pinball, LLC

deeproot Growth Runs Deep Fund, LLC

deeproot 575 Fund, LLC

deeproot 3 Year Bonus Income Fund, LLC

deeproot BonusGrowth 5 Year Debenture Fund, LLC

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deeproot Funds, LLC

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/s/ Randall A. Pulman

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